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VIA ECF

The Honorable Nelson S. Roman
United States District Judge
United States District Court
Southern District of New York
300 Quarropas Street
White Plains, NY 10601

Re: *Sarachek v. Aaronson, et al.*
Docket No.: 18-cv-08393 (NSR)

Dear Judge Roman:

We are counsel to Defendant, Donald Stec, in the above-referenced matter. By letters dated November 12, 2018, counsel for all other defendants requested a pre-motion conference in connection with their anticipated motion to dismiss ("Wilck Letters"). We join in, and incorporate by reference, the substance of the Wilck Letters and request a pre-motion conference as well.

Regarding the jurisdiction argument, in addition to the substance of the Wilck Letters, personal jurisdiction is lacking as to Mr. Stec. Mr. Stec is a resident of Tennessee and has no businesses, real property, bank accounts, and/or any other ties to New York.

Regarding the privilege argument, in addition to the substance of the Wilck Letters, any statements made by Mr. Stec were either non-actionable or absolutely privileged.

Thank you for your consideration in this matter.

Very truly yours,



Michael V. DeSantis

MVD/rk

cc: All Counsel (via ECF)

4849-3020-5809, v. 1